

**Fill in this information to identify the case:**

Debtor 1 Rita Shine Bird

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 17-21787 CMB

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: PNC BANK NATIONAL ASSOCIATION

Court claim no. (if known): 4/1/22

Last 4 digits of any number you use to identify the debtor's account: 0032

Property address:

379 West Wylie Avenue  
Washington, PA 15301

**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 10 / 01 / 2023

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_

c. Total. Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Rita Shine Bird  
First Name Middle Name Last Name

Case Number (if known): 17-21787 CMB

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**\*s/Brian C. Nicholas (Atty ID: 317240)**

Date 09/19/2023

Brian Nicholas  
19 Sep 2023, 15:19:42, EDT

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
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[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Rita Shine Bird fka Rita Shine  
Montano**

**Debtor(s)**

**PNC BANK NATIONAL  
ASSOCIATION**

**Movant**

**vs.**

**Rita Shine Bird fka Rita Shine Montano  
Debtor(s)**

**Ronda J. Winnecour,**

**Trustee**

**BK NO. 17-21787 CMB**

**Judge: Carlota M. Bohm**

**Chapter 13**

**Related to Claim No. 4-1**

**CERTIFICATE OF SERVICE  
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, the undersigned, hereby certify that, on September 19, 2023, a true and correct copy of the RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT was electronically served upon the following using the Court's CM/ECF system:

Attorney for Debtor(s)  
Scott R. Lowden, Esq.  
100 Heathmore Avenue  
Pittsburgh, PA 15227

Trustee  
Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Further, I certify that, on September 19, 2023, a true and correct copy of the RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT was forwarded via U.S. Mail, first class postage prepaid and properly addressed, to the following at the address shown below:

Debtor(s)  
Rita Shine Bird fka Rita Shine Montano  
379 West Wylie Avenue  
Washington, PA 15301

Method of Service: electronic means or first-class mail.

Dated: September 19, 2023

/s/ Brian C. Nicholas  
Brian C. Nicholas, Esquire  
Attorney I.D. 42524  
KML Law Group, P.C.  
BNY Mellon Independence Center  
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